

ORIGINAL

Florida Cable Telecommunications Association

Steve Wilkerson, President

**VIA HAND DELIVERY**

September 6, 2001

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
01 SEP - 6 AM 8:15  
COMMISSION  
CLERK

**RE: Docket No. 011075-TP**

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Petition of Florida Cable Telecommunications Association for Leave to Intervene.

Copies of the Petition to Intervene have been served on the parties of record. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Sincerely,

Michael A. Gross  
Vice President, Regulatory Affairs &  
Regulatory Counsel

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
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- PAI \_\_\_\_\_
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- SEC  \_\_\_\_\_
- SER \_\_\_\_\_
- OTH  \_\_\_\_\_

Enclosure  
cc: All Parties of Record

RECEIVED & FILED  
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DOCUMENT NUMBER - DATE  
11084 SEP-6 01  
FPSC-COMMISSION CLERK

*Done 9/07/01*

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Investigation into allegations of )  
anti-competitive behaviors and practices )  
of Sprint-Florida, Inc. )  
\_\_\_\_\_ )**

**Docket No. 011075-TP**

**Filed: September 6, 2001**

**PETITION OF FLORIDA CABLE TELECOMMUNICATIONS  
ASSOCIATION FOR LEAVE TO INTERVENE**

Pursuant to Rule 25-22.039, Florida Administrative Code, the Florida Cable Telecommunications Association, Inc. ("FCTA"), hereby petitions for leave to intervene in this docket, and states:

1. The FCTA is a non-profit trade association representing the cable telecommunications industry in Florida, including certificated alternative local exchange carriers (ALECs) providing local exchange telecommunications service in Florida. The FCTA's business address is 246 E. 6<sup>th</sup> Avenue, Suite 100, Tallahassee, FL 32303.

2. The name and address of the person authorized to receive all notices, pleadings and other communications in this docket is:

Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303  
Tel: 850/681-1990  
Fax: 850/681-9676  
E-mail: mgross@fcta.com

3. The issues raised in this docket concern allegations of anti-competitive behavior and practices of Sprint-Florida, Inc. The FCTA represents certificated ALECs who provide exchange

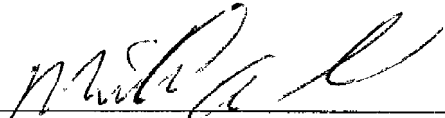
access and local exchange telecommunications services within the territories in which Sprint-Florida, Inc. is the Incumbent Local Exchange Carrier. Accordingly, the FCTA's substantial interests will be affected by the outcome of this proceeding to determine whether Sprint-Florida, Inc. is engaging in anti-competitive behaviors and practices.

4. As the representative of the interests of its members' certificated telecommunications carriers, the FCTA's intervention is appropriate. The FCTA has actively sought to promote telecommunications competition as a party of record in Commission proceedings for many years and has been granted intervention in numerous dockets which directly impacted its members.

5. The FCTA's intervention will advance judicial efficiency by consolidating the participation of the multiple certificated telecommunications carriers it represents.

WHEREFORE, for the foregoing reasons, the FCTA requests that the Commission grant its Petition for Intervention, and afford the FCTA full party status in this proceeding.

Respectfully submitted this 9 day of September, 2001.

  
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Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303  
Tel: 850/681-1990  
Fax: 850/681-9676

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition of Florida Cable Telecommunications Association for Leave to Intervene in Docket 011075-TP has been served upon the following parties by U.S. Mail this 6 day of September, 2001:

Pennington Law Firm  
Peter Dunbar/Karen Camechis  
P.O. Box 10095  
Tallahassee, FL 32302-2095

Messer Law Firm  
Norman H. Horton, Jr.  
P.O. Box 1876  
Tallahassee, FL 32302

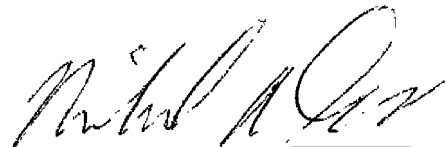
Time Warner Telecom of Florida, L.P.  
Carolyn Marek  
Vice President of Regulatory Affairs  
Southeast Region  
233 Bramerton Court  
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NewSouth Communications  
Lori Reese  
Two Main Street  
Greenville, SC 29609

Florida Public Telecommunications Asso.  
Angela Green, General Counsel  
2292 Wednesday Street  
Tallahassee, FL 32308-4334

Sprint-Florida, Inc.  
Mr. F.B. (Ben) Poag  
(MCFLTLHO0107)  
Tallahassee, FL 32316-2214

McWhirter Law Firm  
Vicki Kaufman  
117 S. Gadsden Street  
Tallahassee, FL 32301



\_\_\_\_\_  
Michael A. Gross